

1 A I see that.

2 Q I recognize it's the same caption as before, but it
3 would have been the practice for you to have reviewed this
4 newsletter before it went out?

5 A Yes, sir.

6 Q And in all likelihood the solicitations that appear
7 in the newsletter were also a subject of the telethon that
8 would have taken place in the spring of 1983?

9 A Yes, sir.

10 MR. SHOOK: Your Honor, we're --

11 JUDGE CHACHKIN: Are you finished with this? All
12 right. We'll take a ten-minute recess.

13 (Whereupon, a recess was called from 3:03 p.m. until
14 3:15 p.m.)

15 JUDGE CHACHKIN: Thank you, Mr. Shook.

16 BY MR. SHOOK:

17 Q Dr. Crouch, please turn to Mass Media Exhibit
18 No. 57.

19 A Yes, sir. I'm there.

20 Q Now, this is a Special Meeting of Trinity
21 Broadcasting Network and it says that it's taking place on May
22 27, 1983. The event that seems to -- one of the events that
23 is noted here is the election of your wife to the Trinity
24 Board of Directors.

25 A Yes.

1 Q Do you have a recollection of that taking place?

2 A Yes, I do.

3 Q Now, can you tell me what, if anything, spurred the
4 addition of your wife to the Board?

5 A Yes, I can. This is now 1983. We've been engaged
6 in this operation, this ministry, for basically ten years. We
7 have come to the realization that this apparently is indeed
8 the, the work, the ministry that we will devote the better
9 years of our lives to, and I just wanted her added to the
10 Board of Directors for some security for herself, as, as well
11 as some continuity to the work in the ministry should anything
12 ever happen to myself.

13 Q When your wife was added to the Board, was she
14 elected also to some office at the corporation?

15 A If it didn't occur here, she was ultimately elected
16 as the Vice President, but I don't believe that occurred in
17 this particular meeting.

18 Q Now, the Minutes reflect that the addition of your
19 wife was upon motion from Mr. Juggert and that it was seconded
20 by Mrs. Duff, but are you telling me that you were the person
21 essentially who wanted your wife on?

22 A Yes. I initiated the request and it was agreed to
23 by the other members.

24 Q So, in the context of the Minutes saying it was
25 moved by Mr. Juggert, this is something where you let Norm

1 know beforehand what you wanted and then in the meeting he
2 simply made the motion instead of yourself?

3 A Essentially.

4 Q Now, looking at the discussion here that says, you
5 know, what it was the Board discussed, do you have any recol-
6 lection of the discussion taking place and that the Minutes
7 were a fair reflection of what occurred?

8 A I think I can characterize the discussion, if not
9 give you a transcript of it.

10 Q Characterization would be fine.

11 A My wife was already doing many duties and services,
12 co-hosting the "Praise the Lord Program" with me, overall
13 editing the, the newsletter, helping with the production of
14 other programs, and it was also felt that this new office
15 would, would perhaps give her a little more influence, stature
16 perhaps, within the organization as she went about a number of
17 these other duties. She has ultimately become the full-
18 fledged Program Director of the Network and functions as a top
19 executive in, in that area and is doing a magnificent job.

20 Q Now, I'd like you to turn to Mass Media Exhibit 58.

21 A Yes.

22 Q Now, can you give me any time-frame for this proxy,
23 because, as you can see, what we have is not dated?

24 A Yes. I can't tell you exactly, but I can tell you
25 that it would not have been a great passage of time from the

1 Board meeting we just referenced to this revokable proxy being
2 granted by my wife to me.

3 Q Can you tell me how it came about that the proxy was
4 prepared?

5 A I presume it was prepared by Mr. Juggert.

6 Q Would it have been, and you can tell me if I'm out
7 on a limb here, would it have been because your wife asked Mr.
8 Juggert to prepare it or is it because somebody else asked Mr.
9 Juggert to prepare it?

10 A She asked me to ask Mr. Juggert to prepare this,
11 simply because she did not enjoy or desire to be deeply in-
12 volved in the highly technical matters of the, of the Board
13 and does not enjoy attending Board meetings.

14 Q So, she was going to be a member of the Board, but
15 she wasn't going to be at most of the meetings?

16 A It was her desire not to attend each and every
17 meeting of the Board, yes, sir.

18 Q And she made that fairly plain to you within a short
19 time after her addition to the Board?

20 A Very plain.

21 Q Very plain. Would the addition of your wife to the
22 Board of Trinity Broadcasting Network on May 27, 1983, be
23 related in any way to Translator TV, Inc.?

24 A I, I certainly can't think of any, any relationship.
25 MR. SHOOK: Now, I'm going to read you something

1 from Mr. Colby May's testimony. That's Exhibit 105. Your
2 Honor, may we go off the record for a second?

3 JUDGE CHACHKIN: Yes. We'll go off the record.

4 (Off the record.)

5 (On the record.)

6 BY MR. SHOOK:

7 Q I'm reading this for the purpose perhaps of jogging
8 your memory here as to what may have spurred the addition of
9 your wife to the Translator -- or to the TBN Board.

10 "However, in 1983..." I'm reading from paragraph
11 15, the second sentence. "However, in 1983, the Commission
12 did provide for minority preferences when it adopted a lottery
13 procedure for such applications. Second report in order,
14 Docket No. 81-768, lottery selection among applicants, 93 FCC
15 2d. 952, 53, Radio Register 2d. 1401, May 27, 1983." Now,
16 that happens to be the date that your wife was added to the
17 Board of TBN. Was it related to you by Mr. May on May 27,
18 1983, that Translator TV, Inc., could not only benefit in the
19 upcoming lottery from a minority preference but also from a
20 diversification preference?

21 A Absolutely not. I -- there was no communication --
22 are, are you telling me that that Commission action was taken
23 on the very day that we held this Board meeting?

24 Q Yes, sir, I am. And it so happens that the meeting
25 at 2:30 in the afternoon California time would be 5:30

1 Washington time, which would be about the time that someone
2 here would know of a Commission release and be able to state
3 what was in it.

4 A I certainly have no memory of that information being
5 provided by anyone.

6 Q So, it would be your testimony that this is just
7 entirely coincidental?

8 A Absolutely. Absolutely. May I ask you a question,
9 Mr. Shook? Would, would it have even been possible, would it
10 have even been possible for us to have received that informa-
11 tion? Commission action taken doesn't -- isn't it several
12 days before news is released?

13 Q We'll be able to explore this as we go along, Dr.
14 Crouch. Now, I'd like you to turn to Mass Media Exhibit
15 No. 59.

16 A Yes, sir. I'm there.

17 Q I managed to get out of, out of sequence here a
18 little bit. This is a reference to a May 23, 1983, statement.
19 Was it about this time that your legal representation changed
20 from the firm of Gammon and Grange to that of May, Dunne, and
21 Gay?

22 A I believe that was the case.

23 Q Were you the person who negotiated with the May,
24 Dunne, and Gay firm as to what legal representation would be
25 given and what fees would be charged?

1 A Yes, sir.

2 Q Were the fees to be charged, and you don't have to
3 give me any figures, I'm not interested in that, but were the
4 fees to be charged for legal work the same regardless of the
5 corporation for which work was done? In other words, the work
6 charged for TBN would be the same as for Trinity Broadcasting
7 of Arizona, would be the same rate for Trinity Broadcasting of
8 Florida, et cetera?

9 A I believe that is correct. I believe there were --
10 that each station was charged a minimum monthly retainer,
11 which if the hours worked for that station exceeded, an hourly
12 rate was billed on top of the retainer. But I don't re-- I
13 couldn't recall exactly what those monthly retainers were for
14 each individual station.

15 Q No, and I'm not, I'm not asking for figures. So,
16 what I'm -- what I am asking for is that the rate charged by
17 the law firm would have been the same regardless of the cor-
18 poration for which work was done?

19 A Yes. I believe that's true.

20 Q Now, did you negotiate that with Mr. May, or was it
21 somebody else in the firm with whom you negotiated?

22 A My best recollection is that discussion was, was
23 handled with Mr. May.

24 Q I'd like you to turn to Mass Media Exhibit No. 60.

25 A Yes, sir. I'm there.

1 Q The stations listed at the top are the owned and
2 operated stations?

3 A Yes, sir.

4 Q I'd like you to turn to Mass Media Exhibit 61.

5 A Yes, sir.

6 Q Now, you will notice that this is the Financial
7 Report for the year ending December 31, 1982, and that the
8 reason I have it sequenced here as I do, if you turn to page 3
9 the cover letter reflects that it was transmitted to the Board
10 of Directors of Trinity Broadcasting Network on or about June
11 3, 1983.

12 A Yes.

13 Q Do you see that?

14 A Yes, sir.

15 Q Now, I'd like you to turn to page 9.

16 A Yes, sir. I'm there.

17 Q And if you could, read to yourself the paragraph
18 following the caption, "Organization and basis of
19 combination..."

20 A Okay. Yes, sir. I've finished that paragraph.

21 Q All right. Specifically, did you note the last
22 sentence in that paragraph, which reads, "The majority of the
23 Board of Directors of each of the affiliated companies con-
24 sists of individuals who are also members of the Board of
25 Directors of TBN."

1 A Yes, sir. I see that.

2 Q Now, do you have any knowledge as to how it came
3 about that the accounting firm would so group companies? Was
4 that done at your direction or do you have any idea whose
5 direction it was done?

6 A Well, it was probably done at my direction. I've
7 always understood that the companies that have a complete
8 majority of the same Directors were in effect what we've been
9 referring to as the owned and operated companies.

10 Q Now, if you'll scan the list of companies here, I
11 believe you will not find any reference to Translator TV, Inc.

12 A Not in this paragraph. I see that.

13 Q You see that. Do you have any knowledge as to why
14 that was the case?

15 A Well, because we didn't consider Translator TV,
16 Inc., to be a, a wholly-owned subsidiary as is indicated here.
17 It had a different Board of Directors.

18 Q Well, let's explore that for a second. The Board of
19 Directors at this time, and by this time I'm -- I guess we
20 have reference to two dates, one being December 31, 1982,
21 because that's the end period for the report, and then the
22 second date would be June 3, 1983, which would be the date of
23 the transmittal. Now, on May 31, 1982, you would agree with
24 me, wouldn't you, that two of the three members of the Board
25 of Translator TV, Inc., also were two of the three members of

1 the Board of TBN?

2 A You, you brought that to my attention earlier, which
3 frankly I had never focused on and I had to stipulate that you
4 were correct. There was a brief period of time there where
5 apparently there was a common -- or at least a majority of the
6 same Board for both TTI and, and, and Trinity Broadcasting.
7 But you can, you can see here the fact that it's omitted, that
8 even if that were the case we didn't -- we still didn't con-
9 sider it to be a wholly-owned subsidiary as we did these other
10 Trinity corporations.

11 Q Well, now, in, in fairness to you, I must point out
12 that when you get to pages 20 and 21 and pages 22 and 23, you
13 will note that Translator TV, Inc., is included. Now, basi-
14 cally, then, what I'm asking you is do you have any knowledge,
15 and I recognize here you didn't write this document, but I'm
16 just asking if you have any knowledge as to why we have
17 Translator TV, Inc., appearing where the numbers are, but not
18 appearing on page 9 for the list of companies.

19 A I, I can't answer that, Mr. Shook. That, that was a
20 decision of the auditing company, evidently, and I, I just
21 can't shed any more light on that.

22 Q Would it be your contention, then, that Translator
23 TV, Inc., and the figures that are noted for revenue and
24 expenses, et cetera, should not have been included in this
25 Financial Statement?

1 A I really consider it to be, in a sense, irrelevant.
2 As I stated earlier, the corporation Translator TV, Inc.,
3 always had its separate ledgers, its set of books. It's a
4 separate line item even on this document, so it can easily be
5 distinguished and identified from any of the other revenues of
6 the wholly-owned subsidiaries. In retrospect, I, I suppose I
7 would have to agree that it would have been better if it had
8 had a completely separate statement and, of course, we all
9 know that later on when Translator TV, Inc./NMTV finally
10 started coming of age, even the auditors recognized this and,
11 and, and did ultimately separate out the financial statements
12 completely.

13 Q But wouldn't you agree that given the definition
14 that appears on page 9 in terms of which company should be
15 included and which should not, that it was indeed proper to
16 include Translator TV, Inc., in this Financial Statement?

17 A That it would have been improper.

18 Q No, sir. What I'm suggesting to you is that it was
19 indeed proper given the definition that appears.

20 A You could, you could certainly interpret it that
21 way.

22 Q Now, with respect to the figures that appear for
23 Translator TV, Inc., first, if we look at the -- well, focus-
24 ing solely on the Fund Balance, which appears on page, pages
25 22 and 23 and specifically the Fund Balance for Translator TV,

1 Inc., appears on page 23, what I read here is a negative Fund
2 Balance of \$106,256, according to this document. Do you see
3 that?

4 A Yes, sir.

5 Q Do you recall that figure being the subject of any
6 discussion among the Board members of Translator TV, Inc.?

7 A No, sir. I do not.

8 Q I'd like to move on to Exhibit -- Mass Media Exhibit
9 62.

10 A Yes, sir.

11 Q Now, apparently, this is -- rather than, rather than
12 have me characterize it, why don't you tell me what, what you
13 understand this letter to be, and I recognize the letter is
14 not directed to you?

15 A It's a letter from Mr. Colby May to, to Jane Duff in
16 which it appears he is spelling out the arrangement of the
17 billing retainer which he and I had discussed earlier.

18 Q Is Mrs. Duff now going to be the point of contact,
19 essentially, between Trinity and the May, Dunne, and Gay law
20 firm?

21 A Mrs. Duff, as, as one of my administrative assis-
22 tants or Assistants to the President, has largely fulfilled
23 that liaison role, yes, sir.

24 Q Now, turning to the second page of Mass Media
25 Exhibit 62, the bill -- or, as I've been calling it in my

1 | exhibits, the statement, is directed to yourself. Do you see
2 | that?

3 | A Yes, sir.

4 | Q Would the statement actually have come to your
5 | attention or would it have been intercepted and dealt with by
6 | Mrs. Duff and you would not have seen it?

7 | A I would very rarely have seen a, a document like
8 | this.

9 | Q Now, recognize, if you will, please, that the fig-
10 | ures are all whited out, so --

11 | A Yes.

12 | Q -- with -- if the figures were here, in terms of the
13 | hours and dollar amounts involved, are you still saying that
14 | you would not have seen a statement such as this in the normal
15 | course?

16 | A I would typically have seen a, a statement from our
17 | Washington attorneys if there had been some unusual activity
18 | that month. I can promise you I will be looking at this
19 | month's statement.

20 | Q Would unusual activity include the addition or
21 | deletion of any entity in terms of charges? For example, this
22 | bill reflects entities noted as TBA, TBD, et cetera. Now, let
23 | me make sure I'm not losing you. I'm looking at the second
24 | page.

25 | A Yes, sir.

1 Q And you see under "Services Rendered" there's a word
2 called "itemization"?

3 A Yes.

4 Q And then there are a number of initials given, and I
5 take it these to be the Trinity companies --

6 A Yes.

7 Q -- in existence at that time?

8 A Yes, sir.

9 Q Now, if a new Trinity company came into being and
10 were subsequently added to the bill, would that have been an
11 occasion for you to at least review the bill?

12 A Possibly. I, I, I really can't answer that for
13 certain. That's about the best I can do.

14 Q Well, what I'm thinking of, you had mentioned an
15 unusual event, and I guess what I'm trying to flesh out, if
16 possible, is what, what such an unusual event might be.

17 A Where the dollar amount would fluctuate wildly would
18 be the primary event. A, a new affiliate or a new station
19 coming on line that simply picked up the typical monthly
20 retainer that was identical to all the other stations might,
21 might not have come to my attention.

22 Q In your negotiations with Mr. May, was it the case
23 that you had arranged with him that if the new Trinity company
24 or a related company were to come into existence that the rate
25 charged that new company would be the same as the rates

1 charged for other Trinity companies?

2 A I believe that generally was the understanding.

3 Q Please turn to Mass Media Exhibit 63.

4 A Yes, sir. I'm there.

5 Q Now, the list of stations at the top are the owned
6 and operated stations?

7 A Yes, sir.

8 Q Recognizing, of course, that one of them is the, the
9 Translator?

10 A Right.

11 Q Now, I'd like you to focus your attention -- it's
12 going to be -- we'll have to count here -- if you could begin
13 14 lines up from the bottom, just read to yourself, the sen-
14 tence begins, "But about two years ago..."

15 A I found it. How far do you want me to read?

16 Q To the end of that paragraph.

17 A Okay. Yes, sir. I've completed that.

18 Q Now, specifically, if you would, focus on the last
19 sentence of that paragraph, "Many are already for sale..." Do
20 you see that?

21 A Yes, sir.

22 Q Now, what's being talked about here are low-power
23 television stations and translator stations, correct?

24 A Yes, sir.

25 Q "And entities are now receiving permits. The FCC

1 has lifted its freeze and is starting to make grants."

2 A Yes, sir.

3 Q "And unfortunately for some of the grantees, they
4 have discovered to their sorrow that they cannot use the
5 permits for one reason or another."

6 A True.

7 Q Now, in terms of sale possibilities, was any consid-
8 eration given to whether TTI, Translator TV, Inc., should be
9 in the market for buying any of these?

10 A I don't, I don't remember any specific consideration
11 for, for TTI acquiring these. Remember, TTI was originally
12 envisioned as a, a minority-controlled corporation that would
13 primarily be used to apply and to take advantage of the minor-
14 ity preference that would be -- that ultimately was granted by
15 the Agency to minority-controlled corporations. So, I'm just
16 raking the back of my mind here. I think that we, meaning
17 Trinity Broadcasting Network, simply preferred to acquire
18 these unbuilt CPs and maybe existing stations directly for TBN
19 and simply continued to allow TTI to fulfill its original role
20 and intent, i.e. taking advantage of the, the minority prefer-
21 ence granted by the, by the Agency.

22 Q Do you recall this morning we had a discussion about
23 the supplement to the first Minutes that occurred relative to
24 Translator TV, Inc., and there was language in there that
25 Translator TV, Inc., would be authorized to do a number of

1 things, one of which was acquire permits. Do you remember
2 that? And if you don't, I -- we can turn back to the --

3 A I, I remember it very well. Acquire, I guess, is a,
4 a broad term. I don't know --

5 Q Oh, it is. But, basically, in August of 1983, am I
6 to understand that there was no thought given that Translator
7 TV, Inc., should be in the market for buying any of the low-
8 power television permits that were becoming available?

9 A It may have been given all the way around, but I --
10 Mr. Shook, I just don't have any independent recollection or
11 memory of, of that.

12 Q You don't recall there being any discussion about
13 whether the -- Translator TV, Inc., should jump into this for
14 itself?

15 A No, sir.

16 Q We're finished with Volume 1.

17 A Wonderful.

18 (Pause.)

19 BY MR. SHOOK:

20 Q I'd like you to direct your attention to Mass Media
21 Exhibit 64, it's the first exhibit of the second volume.

22 A Yes, sir. I'm there.

23 Q Now, I recognize that this letter is from Colby to
24 Jane, it's not to you, but in terms of the first sentence of
25 the second paragraph, there's a reference to an enclosure of

1 | this month's Tri-State Christian TV bill. Do you have any
2 | explanation as to why Colby May is enclosing to Trinity a bill
3 | for Tri-State?

4 | A I think he admits even in his letter here that it's
5 | just a mistake.

6 | Q That would be your understanding of what he's saying
7 | here?

8 | A Yes, sir. I, I just have no knowledge of this
9 | letter at all.

10 | Q Well, I'm not so much asking for your knowledge
11 | about the letter as, you know, the underlying event referenced
12 | in the letter. And if you have no knowledge, that's fine. I
13 | can ask somebody else.

14 | A No, sir. I, I have no knowledge of that.

15 | Q I'd like to turn to Mass Media Exhibit 65.

16 | A Yes, sir. I'm there.

17 | Q This is a California Form 199, apparently for the
18 | year 1982, although it's not terribly clear from the document
19 | itself. Do you have any recollection of having reviewed this
20 | document before it was completed?

21 | A No, sir. I, I do not.

22 | Q It would not have been your practice to have re-
23 | viewed such a document?

24 | A No, sir.

25 | Q Do you have any knowledge as to who at Translator

1 TV, Inc., if anyone, would have been responsible for reviewing
2 this document prior to its being sent out?

3 A If, if anyone, it would have been Mrs. Duff to my --
4 best of my knowledge.

5 Q I'd like you to turn to Mass Media Exhibit 66.

6 A Yes, sir. I'm there.

7 Q All right. We're now up to November 1983.

8 A Yes.

9 Q There's a reference here to a Praise-a-thon that's
10 apparently coming up shortly. First off, the list of stations
11 at the top are the owned and operated stations, correct?

12 A Yes, sir.

13 Q Now, moving to page 3, once again we have the
14 Praise-a-thon projects, this time for the autumn of 1983. Do
15 you see that?

16 A Yes, sir.

17 Q Turning to page 5, right-hand column, second entry.

18 A Yes, sir.

19 Q Would it have been typical for you to have reviewed
20 this document before it left Trinity?

21 A I'm certainly beginning to wonder now if I did. But
22 it -- yes, sir, it would have been typical.

23 Q Well, you'll be happy to know that in the course of
24 my review of this document, I could not find any reference to
25 an additional solicitation for low-power stations. The

1 question I have for you is can you tell me why any such solic-
2 itations were deleted? Or do you have any knowledge of that
3 at all?

4 A I do not have any knowledge of that. I'm, I'm
5 puzzled by it, especially in the light of the fact that appar-
6 ently low-power stations were now beginning to be available.
7 So, I'm, I'm, I'm puzzled by that and I'm sorry. I just -- it
8 may have been a, a, a mistake.

9 Q All right. But you don't have any knowledge as to
10 why it apparently was taken off the list of special projects?

11 A No, sir, I do not.

12 Q Again, if the project appeared in the newsletter, in
13 all likelihood it was the subject of a solicitation at the
14 telethon?

15 A Yes, sir.

16 Q Is there -- do you have any knowledge, though, as to
17 whether or not a solicitation was made for the acquisition of
18 low-power television stations despite the fact that no such
19 solicitation appears in the newsletter?

20 A I have no independent knowledge or memory of that,
21 but I can tell you that just because it was omitted from the
22 newsletter does not mean that a solicitation was not made.
23 It, it could have been.

24 Q Now, I'd like you to turn to Bureau Exhibit 67.

25 A Yes, sir.

1 Q Specifically, if you would, turn to page 9. And so
2 you're oriented as to what this document is, it's reflected
3 that it's the Ownership Report for KD-- KTBN TV, Santa Anna --

4 A Yes, sir.

5 Q -- for the year 1983.

6 A Yes, sir.

7 Q Now, when you go to page 9, what I'd like you to
8 focus on is the name of the party having interest, and the
9 person's name is your wife, Jan Crouch. Do you see, that it's
10 the very last entry there on page 9?

11 A Yes.

12 Q Now, the way I understand this, and you can correct
13 me if I'm wrong, is that Jan was a Board member for Trinity
14 Broadcasting Network but she was not a Board member for
15 Arizona, Indiana, New York, et cetera at this time.

16 A At this time I believe she was not.

17 Q Now, did there come a time when she became a Board
18 member of those other corporations?

19 A I believe so.

20 Q And do you recall how that came about?

21 A No, sir, I don't. I, I believe it happened at one
22 of the Annual January Board Meetings, but I, I, I would have
23 to look at the record to find out if and when that actually
24 occurred.

25 Q I'd like you to turn to Mass Media Exhibit 68.

1 A Yes, sir.

2 Q Now, I recognize from your testimony just a little
3 while ago that in all likelihood you would not have seen this
4 statement, although it is directed to you. And that's, that's
5 still your testimony?

6 A Yes, sir.

7 Q Now, what I'd like you to do is compare the entries
8 that appear underneath your name where it says, "Ray..." and
9 then there are various initials noted?

10 A Yes, sir.

11 Q You will note that the very last entry is CET for
12 the January 4, 1984, statement.

13 A Yes.

14 Q And if you compare that with page 2 of Mass Media
15 Exhibit 64, CET does not appear.

16 A I see that.

17 (Off the record.)

18 (On the record.)

19 BY MR. SHOOK:

20 Q So, I take it that at some point between July 1983
21 and January 1984, CET came into existence insofar as Trinity
22 was concerned?

23 A Apparently, the Harlingen, Texas, station came on-
24 line at that -- during that period sometime.

25 Q And that consistent with your earlier testimony that

1 the rate charged for CET would be the same rate charged for
2 the other entities noted here?

3 A Yes.

4 Q And that didn't require a separate retainer letter,
5 did it?

6 A I, I don't know that any separate retainer letter
7 was generated for, for CET.

8 Q I'd like you to turn to Mass Media Exhibit 69.

9 A Yes, sir.

10 Q Now, once again, I will note for your benefit that
11 this letter is not directed to you nor does it reflect that
12 you were copied. However, if you could read through it, and
13 then I'll ask you a question.

14 A It's evident that Mr. Juggert was sending the
15 Minutes of our Annual Meeting to the -- to Colby May and to
16 Jane Duff for their review and possible corrections.

17 Q Now, this is -- this -- perhap-- maybe it's just
18 something that I'm confused of, and you can help me here.
19 Where it says, "Proposed Minutes of our Annual Meeting..."
20 given the date, January 10, 1984, and if you turn to Mass
21 Media Exhibit 70 it reflects that the Annual Meeting for
22 Trinity and its affiliated corporations took place on January
23 20. So, this could mean -- the reference in Exhibit 69 could
24 mean one of two things, and I'm going to ask you if you can
25 help me, which one of those two things it is, and that is is

1 | it the Minutes for the 1983 Meeting or are we talking really
2 | about the agenda for the 1984 Meeting?

3 | A No, minutes are minutes. I take this to mean that
4 | Mr. Juggert is sending us -- sending them the, the Minutes of
5 | the previous year's Meeting for their review and possible
6 | corrections before being read at the 1984 Meeting coming up.

7 | Q So, it would not have been the case that minutes
8 | were prepared before the Meeting actually took place concern-
9 | ing that Meeting?

10 | A No.

11 | Q You would wait to prepare minutes until after the
12 | Meeting had taken place?

13 | A You, you can't prepare minutes until the meeting is
14 | underway or over.

15 | Q Well, I recognize that that might be difficult, but
16 | I'm just checking to see whether it happened.

17 | A It certainly didn't happen, to my knowledge.

18 | JUDGE CHACHKIN: We'll, we'll be in recess until
19 | 9 a.m. tomorrow morning.

20 | (Whereupon, at 4:00 p.m on Wednesday, December 15,
21 | 1993, the hearing was adjourned until 9:00 a.m. Thursday,
22 | December 16, 1993.)

23 |

24 |

25 |

CERTIFICATE OF REPORTER, TRANSCRIBER, AND PROOFREADER

IN THE MATTER OF TRINITY BROADCASTING OF FLORIDA, INC.
Name AND GLENDALE BROADCASTING COMPANY

MM DOCKET NO. 93-75
Docket No.

WASHINGTON, D.C.
Place

DECEMBER 15, 1993
Date

We, the undersigned, do hereby certify that the foregoing pages, numbers 2423 through 2595, inclusive, are the true, accurate and complete transcript prepared from the reporting by MARYKAE FLEISHMAN in attendance at the above identified proceeding, in accordance with applicable provisions of the current Federal Communications Commission's professional verbatim reporting and transcription Statement of Work and have verified the accuracy of the transcript by (1) comparing the typewritten transcript against the reporting or recording accomplished at the proceeding and (2) comparing the final proofed typewritten transcript against the reporting or recording accomplished at the proceeding.

December 27, 1993
Date

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Diana J. Hallman, Transcriber
Free State Reporting, Inc.

December 30, 1993
Date

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Balt. & Annap. 974-0947